

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Chapter 13
ARLINDA CANDELARIO	:	
	:	
Debtor	:	Case No. 16-18330(JKF)
	:	
	:	<b>Hearing Date: 9/20/17</b>
	:	<b>Time: 9:30 a.m.</b>
	:	<b>Courtroom #3</b>
	:	<b>900 Market Street</b>
	:	<b>Philadelphia, PA 19107</b>

**DEBTORS' ANSWER TO  
THE MOTION FOR RELIEF FROM STAY OF PENNSYLVANIA HOUSING FINANCE  
AGENCY**

The Debtor, Arlinda Candelario, hereinafter referred to as the "Debtor," by and through her counsel, Center City Law Offices, LLC, hereby respectfully files her answer in opposition to the Motion for Relief filed by the Pennsylvania Housing Finance Agency ("PHFA"). For the reasons more fully set forth below, the Debtor submits that there is no basis for PHFA's Motion.

1. Admitted.
2. Admitted.
3. Admitted
4. Admitted.
5. Admitted.
6. Admitted in part, denied in part. Admitted that Debtor failed to make certain payments; denied in that Debtor has filed an Amended Plan that will cure all pre-petition and post-petition payments due to Movant. Moreover, Debtor relied on Movant's promise to provide Debtor with a loan modification and therefore all delays in payment by Debtor was the sole fault of Movant.
7. Denied in that Movant's own delay and inactivity on Debtor's loan modification caused

Movant's attorney's fees and legal costs.

8. Denied. Debtor's post-petition payments do not total more than \$3,600.
9. Denied as a conclusion of law.
10. Denied as a conclusion of law.

WHEREFORE, the Debtor, Arlinda Candelario respectfully prays this Honorable Court deny any and all relief requested presently by the Motion of PHFA.

Respectfully submitted,

*CENTER CITY LAW OFFICES, LLC*

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